

# Exhibit D

AFFIDAVIT OF RAHIM RAJWANI

State of Texas

County of Fort Bend

Before me, the undersigned authority, on this day, personally appeared RAHIM RAJWANI, who swore or affirmed to tell the truth and stated as follows:

1. "My name is Rahim Rajwani. I am of sound mind and capable of making this sworn statement. I have personal knowledge of the facts written in this statement. I understand that if I lie in this statement, I may be held criminally responsible. These statements are true.
2. Speak2Voice LLC was formed in 2015 and it has an established agent for service of process in Texas. It was formed by Shahida Khan. I am a managing member of Speak2Voice LLC. and have authority to speak on its behalf.
3. Speak2Voice has timely filed all corporate filings each year since 2015, which are on file with the Texas Secretary of State. Speak2Voice LLC is not a sham corporation.
4. Attached hereto is the certificate of formation of Speak2Voice LLC. This company has been in good standing for almost Ten (10) years. No legal matters have ever found anything to the contrary.
5. The allegations in Plaintiff's petition are based on a contract where Speak2Voice promised to pay Plaintiff a sum of One Million Two Hundred and Seventy-Nine Thousand Three Hundred and Seventy dollars. Plaintiff attaches Exhibit A, which shows invoices between Speak2Voice LLC and Plaintiff. As Exhibit B, Plaintiff attaches a statement that is also between Speak2Voice and Best International Cargo. My name does not appear in either exhibit provided by Plaintiff.

6. As Exhibit C with its petition, Plaintiff attaches a Conditional Settlement Agreement and Release between Speak2Voice, Best International Cargo Inc. and North America Machinery LLC. entered in January 2024. This is the basis of Plaintiff's various causes of action in this lawsuit. I expressly signed the Conditional Settlement and Release Agreement as a member of Speak2Voice LLC.

7. Exhibit C also includes checks made out between Speak2Voice and Plaintiff. There are no checks from my personal account for the Plaintiff that exist.

8. The entirety of Plaintiff's claims is based on breach of the Conditional Settlement and Release Agreement. I had no personal involvement in that agreement or the payments under that agreement.

9. Speak2Voice LLC has maintained a separate corporate banking account. I have separate bank accounts.

10. I have no personal involvement in the Conditional Settlement Agreement and Release. Plaintiffs counts One through Five are based on the Conditional Settlement and Release Agreement between Speak2Voice, Best International Cargo Inc. and Plaintiff. At the end, Plaintiff added me personally, in suit, under alter ego theory, without specific factual allegations for this claim.

11. I have read the foregoing paragraphs of this Declaration, and all the facts stated therein are true and correct and within my personal knowledge."

*Rahim Rajwani*  
RAHIM RAJWANI, Affiant

State of Texas  
County of Fort Bend

SWORN and SUBSCRIBED before me, the undersigned authority on the 24 day of  
April, 2024 year by Rahim Rajwani.

*[Signature]*

Notary Public of Texas

Notary's Seal:

